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AUG 18 2006

REMARKS

The Office Action of May 18, 2006 has been carefully considered. In response thereto, the claims have been amended as set forth above. Reconsideration in view of the foregoing amendments and the following remarks is respectfully requested.

Claim 1 was rejected as being indefinite and has been amended in accordance with the Office Action.

Claims 1-10 were rejected as being anticipated by each of the following: Erickson, Lightfoot and Holt. These rejections are respectfully traversed, and reconsideration is respectfully requested.


As recited in Claim 1, the invention uses the positions of reflectors located at known positions to determine the unknown position of the receiver device. Erickson describes the presence of reflectors but does not teach or suggest that the positions of the reflectors are known or that such positions are used to determine the unknown position. Rather, the positions of known-position locators, active devices quite different from passive reflectors, are used to determine the unknown position.

As recited in Claim 1, the unknown position *of a receiver device* is determined using reflected signals. Lightfoot, on the other hand, determines the positions of a transmitter 22 and a reflector 24. The position of the receiver 20 in Lightfoot is known from other instrumentation.

The same distinction applies to Holt. As recited in Claim 1, the unknown position of a receiver device is determined using reflected signals. Holt, on the other hand, determines the position of a transmitter 64 with the help of reflections from a reflector 60. The position of the receiver 62 in Holt is known.

Claims 1-14 are therefore believed to be allowable.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "M. J. Ure", is written over a horizontal line.

Michael J. Ure, Reg. 33,089

Dated: August 17, 2006